

FILED

APR 13 2021

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Greeneville

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE

UNITED STATES OF AMERICA )

v. )

RICHARD N. NAPIER )

a/k/a a person with the initials V.E.N. )

No. 2:21-CR- 30

JUDGE Greer

FILED UNDER SEAL

**INDICTMENT**

**COUNT ONE**

**(False Use of a Social Security Number, 42 U.S.C. § 408(a)(7)(B))**

The Grand Jury charges that on or about June 2, 2020, within the Eastern District of Tennessee and elsewhere, defendant, RICHARD N. NAPIER, using the alias of a person whose initials are V.E.N., for any purpose, that is, to evade and avoid criminal liability for operating a motor vehicle on a revoked driver's license in violation of Tennessee law, did willfully, knowingly, and with the intent to deceive, falsely represent that his Social Security account number was 403-17-xxxx, when in fact, as defendant well knew, Social Security account number 403-17-xxxx was not assigned to defendant.

[42 U.S.C. § 408(a)(7)(B)]

**COUNT TWO**

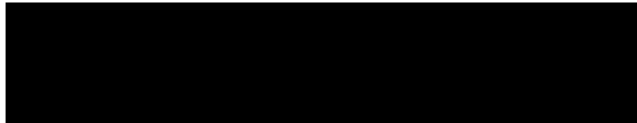
**(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))**

The Grand Jury further charges that on or about June 2, 2020, within the Eastern District of Tennessee and elsewhere, RICHARD N. NAPIER, using the alias of a person whose initials are V.E.N., during and in relation to the felony violation of false use of a social security number as alleged in Count One, above, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, that is, the name, date of birth, state of

Kentucky driver's license number, and Social Security number of the actual person whose initials are V.E.N.

[18 U.S.C. § 1028A(a)(1)].

A TRUE BILL:



GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III  
Acting United States Attorney

By:

A handwritten signature in blue ink, appearing to be 'MH' or similar initials, written over a horizontal line.

Mac D. Heavener, III  
Assistant United States Attorney